

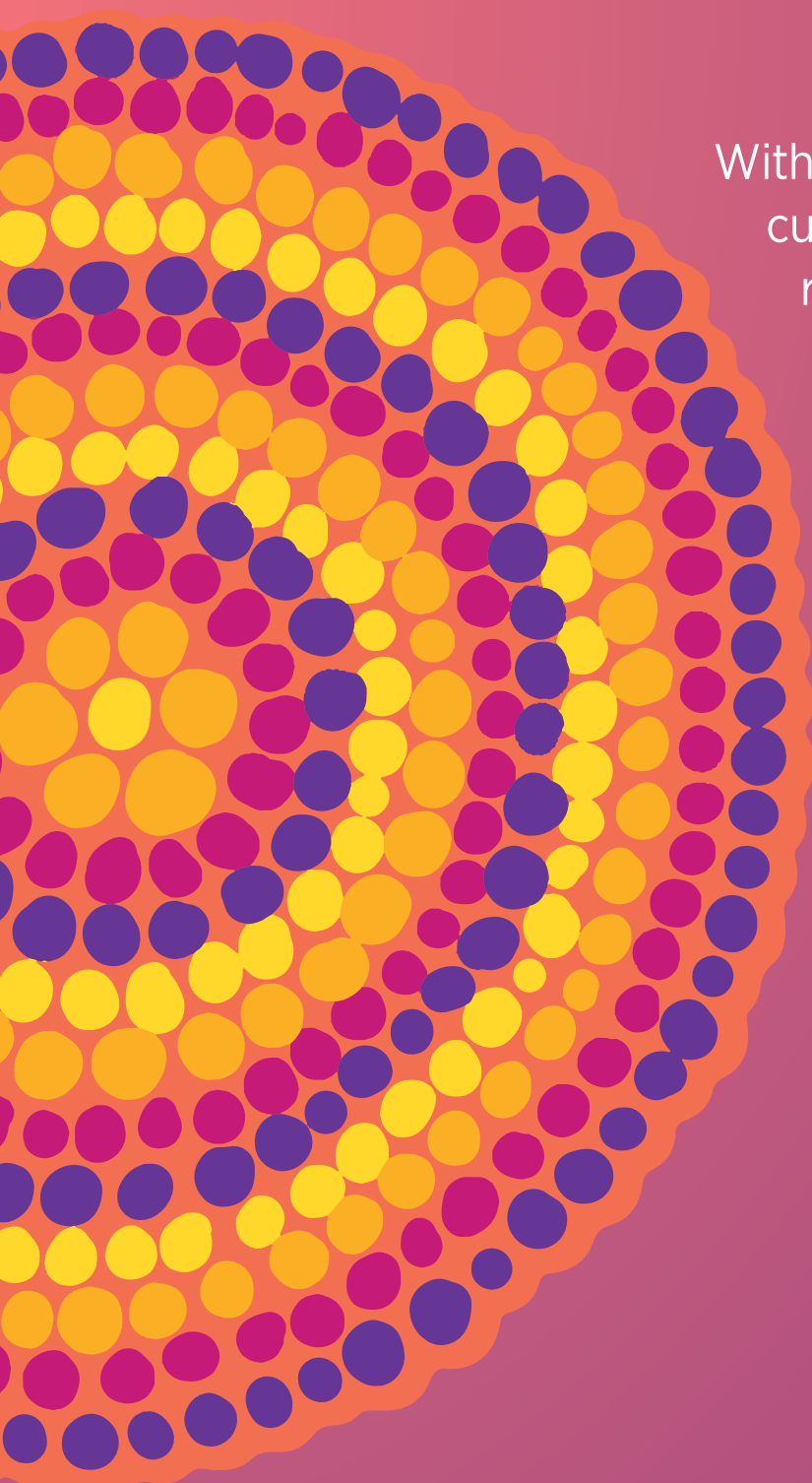


WESTERN SYDNEY
UNIVERSITY

MODERN SLAVERY STATEMENT

JANUARY 2025 – DECEMBER 2025

02/ **ACKNOWLEDGEMENT OF COUNTRY**



With respect for Aboriginal cultural protocol and out of recognition that its campuses occupy their traditional lands, Western Sydney University acknowledges the Darug, Dharawal, Gadigal, Gundungurra and Wiradjuri Peoples and thanks them for their support of its work on their lands (Greater Western Sydney and beyond).

03/ TABLE OF CONTENTS

04/ ABOUT THIS STATEMENT

05/ MESSAGE FROM OUR CHANCELLOR AND VICE-CHANCELLOR

06/ OUR 2025 PROGRESS AND FUTURE PRIORITIES

08/ ABOUT WESTERN SYDNEY UNIVERSITY

10/ OUR OPERATIONS AT A GLANCE

11/ OUR SUPPLY CHAIN AT A GLANCE

12/ IDENTIFYING OUR MODERN SLAVERY RISKS

Modern slavery risks in our operations	12
Potential Modern Slavery risks related to our operations	14
Modern slavery risks in our supply chain	16

18/ OUR ACTIONS TO ADDRESS OUR MODERN SLAVERY RISKS

Policies and governance	19
Due diligence for suppliers and other business partnerships	22
Training and awareness-raising, including student engagement and support	24
External stakeholder collaboration	25
Grievance mechanisms and remediation	25

29/ ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

30/ CONSULTATION

31/ REPORTING CRITERIA DISCLOSURE MATRIX

Appendix 1: Entities covered by this statement	31
Appendix 2: GRS Annual Reporting	32



HOW TO SEEK ASSISTANCE IF YOU ARE CONCERNED ABOUT MODERN SLAVERY

If you are a Western Sydney University student and are concerned you, or somebody you know, may be experiencing, or are at risk of modern slavery, support is available. **In an emergency, call Triple Zero (000).**

The University has safe reporting channels you can use to raise concerns about modern slavery and seek support:

STUDENT LEGAL SERVICES
Contact Student Legal Services for free legal advice and referrals:
studentlegalservices@westernsydney.edu.au
OR 02 9685 4788

THE JUSTICE CLINIC
You can also visit the Justice Clinic through free drop-in appointments (see the Justice Clinic website for details:
westernsydney.edu.au/schools/sol/student-legal-services

STUDENT COUNSELLING SERVICE
Contact the Student Counselling Service by email or phone:
counselling@westernsydney.edu.au
OR 1300 668 370

You can also access support through the services below.
These services are *not* provided through Western Sydney University:

NSW ANTI-SLAVERY COMMISSIONER
antislavery@dcj.nsw.gov.au
OR 1800 FREEDOM
(1800 3733366)

AUSTRALIAN FEDERAL POLICE
Call
13 12 37

SALVATION ARMY
arp@salvationarmy.org.au
OR 1800 000 277

ANTI-SLAVERY AUSTRALIA
asalegal@uts.edu.au
OR 02 9514 8115

04/ ABOUT THIS STATEMENT

This Modern Slavery Statement (the Statement) has been prepared by Western Sydney University (Western) to meet the requirements of the Modern Slavery Act 2018 (Cth) for the period 01 January 2025 to 31 December 2025 (the reporting period).

Serving as our sixth statement, it is issued on behalf of Western Sydney University (ABN 53 014 069 881), which is the sole reporting entity for the purposes of the Modern Slavery Act 2018 (Cth). The statement also includes information where relevant about Western Sydney University's affiliated entities (listed below). References to "we", "us", "our", "Western" or "the University" in this statement are intended to encompass both Western Sydney University and its affiliated entities, except where information is identified as relevant to specific entities.

- Whitlam Institute within Western Sydney University Limited (ABN/ACN 50 100 342 309)
- The Trustee for Whitlam Institute within Western Sydney University Trust (ABN/ACN 42 247 216 279)
- Western Sydney University Enterprises Pty Limited trading as Western Sydney University The College (ABN/ACN 44 003 474 468)

- Western Sydney University Early Learning Limited (ABN/ACN 39 155 993 445)
- Western Growth Developments (Innovation Hub Parramatta) Pty Limited (ABN/ACN 36 626 590 029)
- Western Growth Developments (Westmead) Pty Limited (ABN/ACN 93 625 406 411)
- Western Sydney University International College Pty Limited trading as Western Sydney University International College (International College) (ABN/ACN 25 604 796 189)
- Yayasan Western Sydney University Indonesia (Western Sydney University Indonesia Foundation)

This statement was developed through consultation with the owned or controlled entities (affiliated entities) listed above. The consultation process is outlined on page 30. As a single statement made by one reporting entity, the Modern Slavery Act (Cth) requirement to describe consultation with other reporting entities does not apply. This Modern Slavery Statement was subsequently approved in May 2026 by the Board of Trustees of Western Sydney University, as the peak governing body of the University. The statement has been signed by Professor Jennifer Westacott AC, Chancellor as the Chair of the Board of Trustees and Distinguished Professor George Williams AO, Vice-Chancellor and University President.



05/ MESSAGE FROM OUR CHANCELLOR AND VICE-CHANCELLOR



Universities are a central part of Australia's civic life as anchor institutions in their local communities.

All universities – including Western Sydney University (WSU) – are essential to the nation's economic and social progress, including by promoting and upholding respect for human rights. In this context, WSU has responsibility to take action to address possible modern slavery risks that could impact its students, suppliers, or other stakeholders.

No university is immune from modern slavery risks and WSU recognises it may be exposed to a diverse range of potential risks, whether through the goods and services it procures, its third-party service providers, research partnerships, or investment activities. WSU also acknowledges the unique vulnerabilities faced by its international students who may be at greater risk of exploitation by third parties.

During 2025, the University took significant steps to further strengthen its modern slavery response, including:

- Launching WSU's first Human Rights Policy and a separate Sustainable Procurement Framework.
- Releasing modern slavery e-learning modules to international students and staff involved in the procurement process.
- Providing ongoing pro bono legal services to victim survivors of modern slavery through Western's Justice Clinic, which also delivered an inaugural Anti-Slavery Student Ambassador program.
- Continuing to work with peers through the Australian Universities Procurement Network.
- Engaging with key external stakeholders through initiatives such as a multi-stakeholder modern slavery roundtable on international student recruitment.

WSU understands the importance of a continuous improvement approach to addressing modern slavery risks.

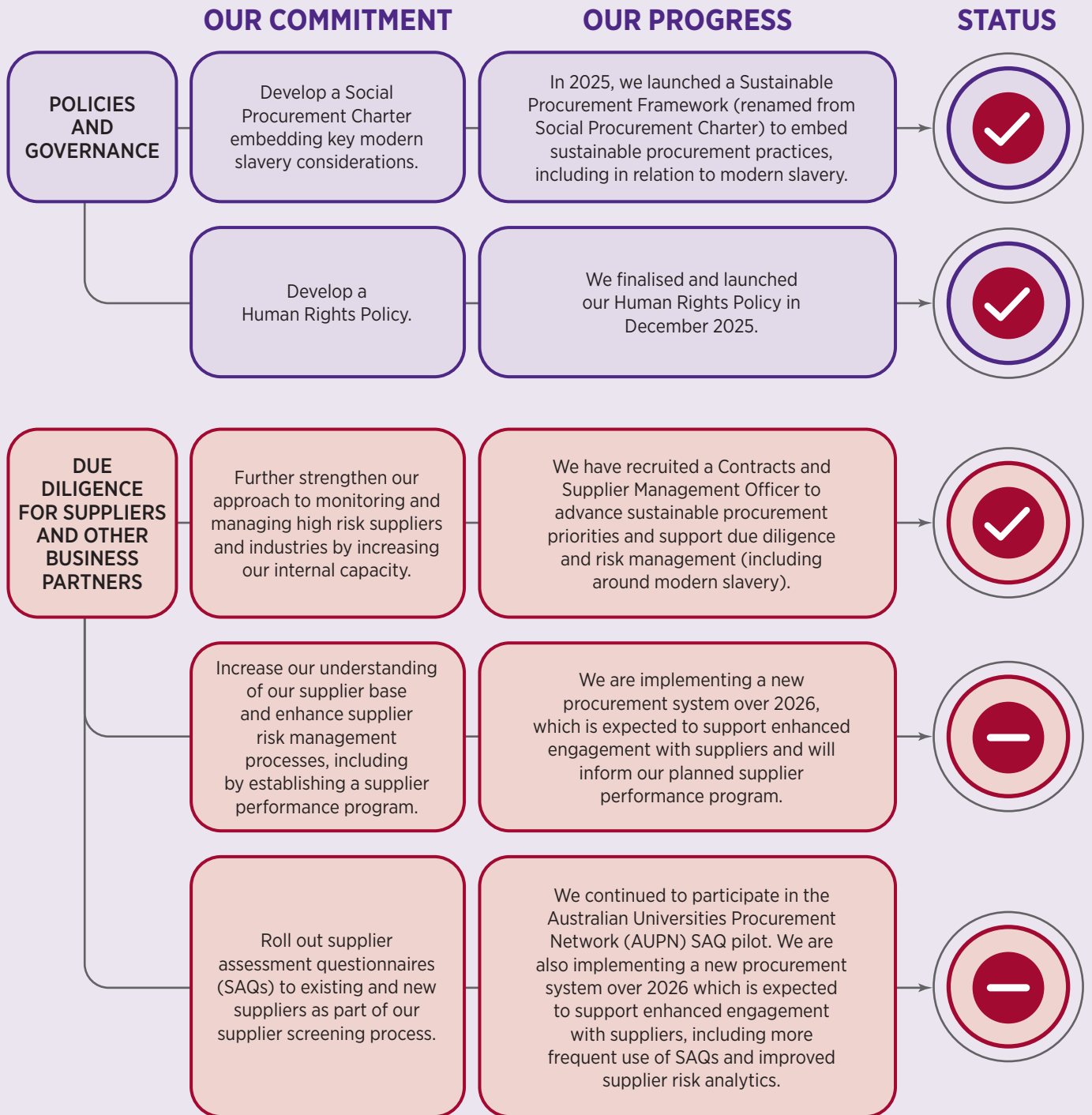
In 2026, its priorities include implementing a new procurement system, which is expected to support enhanced engagement with suppliers around modern slavery. WSU will also work to implement its Sustainable Procurement Framework. More broadly, the University will continue to monitor and, where appropriate, support the important work of the New South Wales Anti-Slavery Commissioner, Dr James Cockayne, including in relation to international students.

The University looks forward to continuing to work with staff, students, suppliers and other stakeholders to drive positive change and deepen its commitment to human rights across Western's operations and supply chains.

Professor Jennifer Westacott AC
Chancellor, Western Sydney University

Distinguished Professor George Williams AO
Vice-Chancellor and President, Western Sydney University

06/ OUR 2025 PROGRESS AND FUTURE PRIORITIES





WESTERN SYDNEY
UNIVERSITY



ABOUT WESTERN SYDNEY UNIVERSITY

Western Sydney University is the anchor higher education institution of Western Sydney, a region of enormous diversity and potential. Our deep commitment to Western Sydney inspires us to work collaboratively with industry, government, and communities to advance the economic, social, and environmental prosperity of our region.

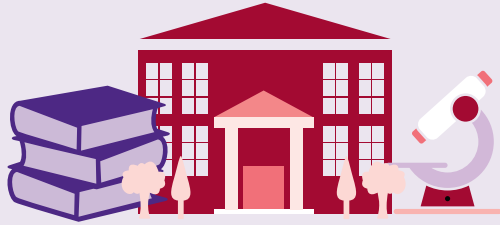
We are a multi-campus university with almost 50,000 students spread across Western Sydney (13 campuses) and Southeast Asia (Vietnam and Indonesia). Two-thirds of our students are the first in their family to attend university, and almost half speak a language other than English at home. The University is governed by a Board of Trustees chaired by the Chancellor. The Vice-Chancellor is the University President, responsible for managing all academic and administrative areas of the University.

We are world leaders in sustainability, ranked first for four years in a row (2022 to 2025) in the Times Higher Education Impact Rankings for our commitment to the 17 United Nations Sustainable Development Goals.



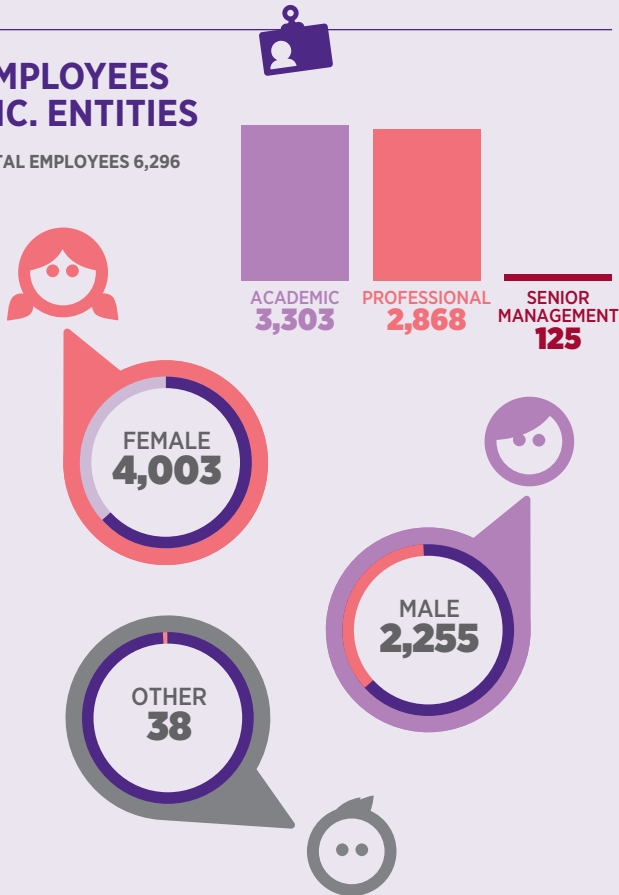
10/ OUR OPERATIONS AT A GLANCE

13 CAMPUSES



EMPLOYEES INC. ENTITIES

TOTAL EMPLOYEES 6,296



TIMES HIGHER EDUCATION IMPACT RANKINGS 2025

#1
IN THE WORLD
& AUSTRALIA
OVERALL

OVER 400 COURSES

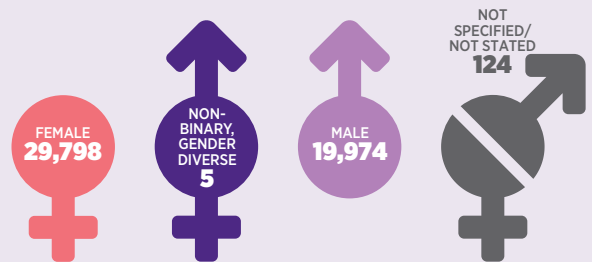


ACROSS A RANGE OF FACULTIES, THE COLLEGE & INSTITUTES

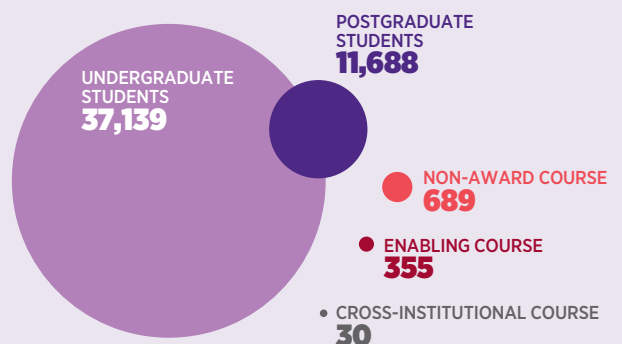
VOLUME OF COURSES



STUDENT HEADCOUNT BY GENDER



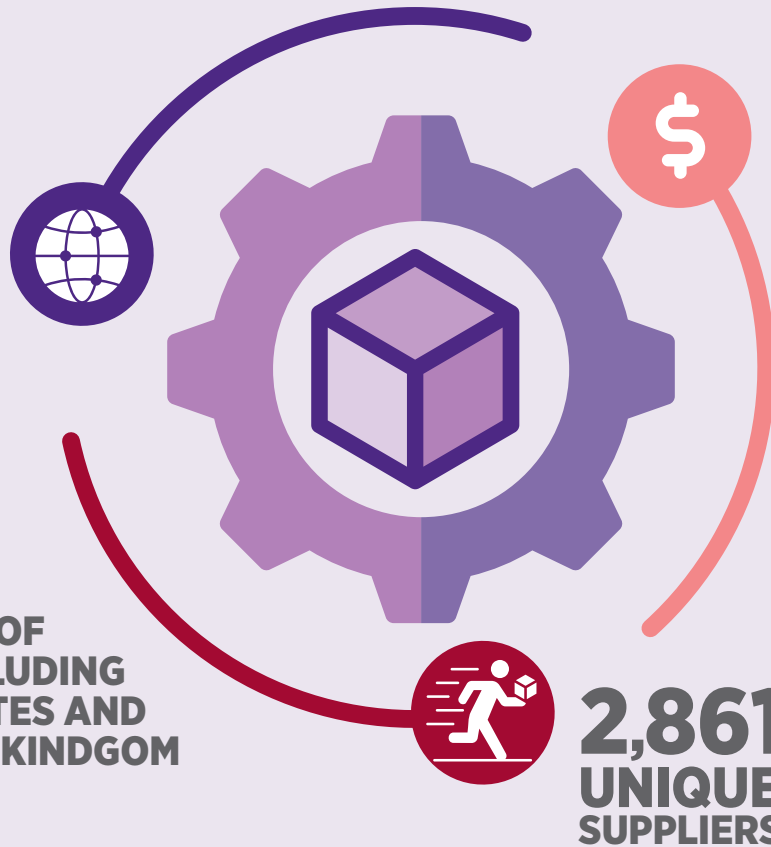
STUDENT HEADCOUNT BY COURSE



11/ OUR SUPPLY CHAIN AT A GLANCE

2,598
SUPPLIERS
LOCATED IN
AUSTRALIA

82%
OF OUR
SUPPLIER
BASE WITH
OTHER
COUNTRIES OF
SUPPLY INCLUDING
UNITED STATES AND
THE UNITED KINGDOM

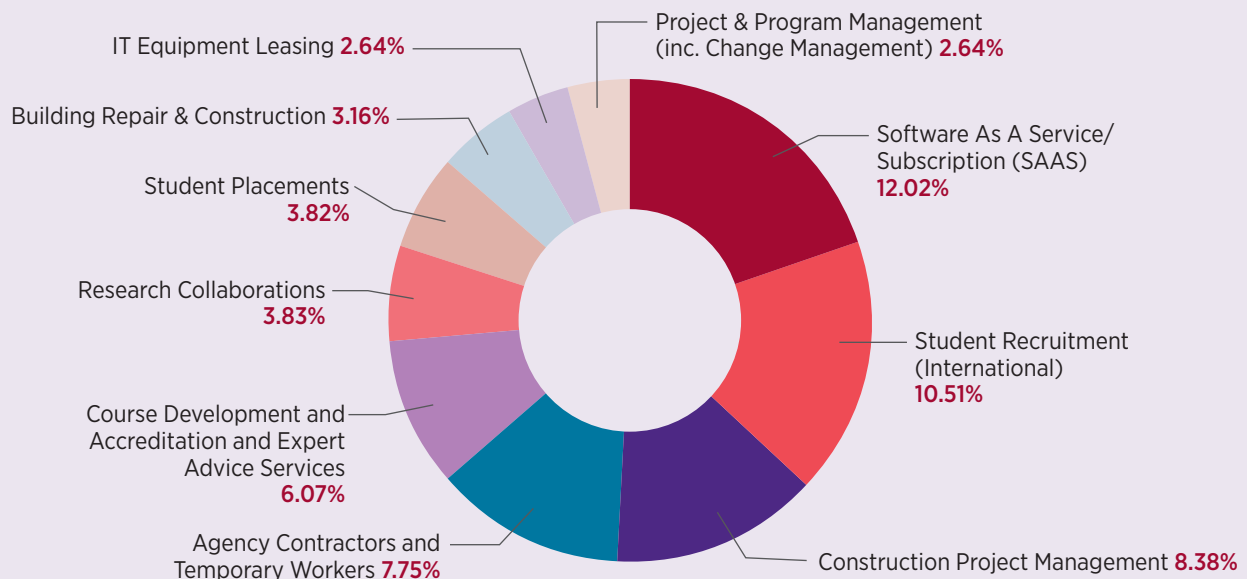


\$377.3
MILLION
TOTAL
SPEND

2,861
UNIQUE
SUPPLIERS



TOP TEN CATEGORY SPENDS



12/ IDENTIFYING OUR MODERN SLAVERY RISKS

Universities can be exposed to a complex range of modern slavery risks. This reflects the breadth and diversity of our activities and supply chain.

MODERN SLAVERY RISKS IN OUR OPERATIONS

Modern slavery risks can occur in any sector or geography, including the operations of higher education institutions like Western Sydney University.

While our most severe modern slavery risks are likely to arise in our supply chain, we have identified a number of modern slavery risks relevant to our operations. These risks arise where our operational activities intersect with groups who may be more vulnerable to modern slavery, such as international students and younger workers. These risks are outlined over the following pages.

We do not consider that our direct engagement of workers presents modern slavery risks. Our academic and professional staff are engaged in accordance with relevant workplace laws and are free to bargain collectively, join unions, and leave their employment without material restrictions. Additionally, all staff have access to reporting channels to enable them to safely raise concerns, including our whistleblower framework. Our policy framework and employee training program also support us to maintain a safe and respectful workplace, including by addressing issues such as discrimination and harassment that may create an enabling environment for modern slavery.



HOW WE APPLY THE UNGPs CONTINUUM OF INVOLVEMENT

CAUSE

An entity is considered to cause modern slavery where its own operations or activities directly result in modern slavery practices. This may mean employment practices that lead to forced labour or exploitative conditions within its workforce.

CONTRIBUTE

An entity contributes to modern slavery when its actions or business practices enable, encourage, or facilitate modern slavery, even if it does not directly cause the harm. This can occur, for example, through poor purchasing practices, unrealistic delivery timeframes, or lack of oversight that contributes to exploitative conditions in a supplier's operations.

DIRECTLY LINKED

An entity is directly linked to modern slavery when the harm is caused by a business relationship, such as a supplier, contractor, or other third party, through its products, services, or operations, even if the entity has not caused or contributed to the harm. While the link may be indirect, the organisation still holds a responsibility to take reasonable steps to address the risk.

HOW WE ACCESS OUR MODERN SLAVERY RISKS

INFORMATION SOURCES

- Global Slavery Index and other Resources
- Peer Networks
- Australian Government and NSW Anti-Slavery Commissioner
- Human Rights Organisations
- Relevant Media Sources

OUR UNDERSTANDING OF OUR RISK PROFILE

INCLUDING POTENTIAL LEVEL OF INVOLVEMENT AS PER THE UNGPs

**KEY RISK
AREAS FOR OUR
OPERATIONS**

**KEY RISK
AREAS FOR OUR
SUPPLY CHAINS**

IDENTIFYING OUR MODERN SLAVERY RISKS

– CONTINUED

POTENTIAL MODERN SLAVERY RISKS RELATED TO OUR OPERATIONS

Our relationship to these risks will vary depending on the specific context. For instance, in cases involving the exploitation of international students, we may be directly linked to the harm through our operations or partnerships. In some circumstances, we could also contribute to the risk, particularly if we do not take appropriate action in response to reports or indicators of exploitation.

INTERNATIONAL STUDENTS  Potential risk level: Higher	International students are recognised as a group who may be vulnerable to modern slavery and other forms of exploitation. The New South Wales (NSW) Anti-Slavery Commissioner has also raised the vulnerability of international students to modern slavery as a ‘significant issue’ for universities under section 31(1)(a) of the NSW Modern Slavery Act 2018. These risks can occur in several contexts. In some circumstances, international students may be subject to unethical or fraudulent practices by international recruiters or scammers posing as recruitment agents. This may include situations of debt bondage (a form of modern slavery), where students are coerced or deceived into paying excessive fees to obtain visas or to lodge fake enrolment applications. We focus on providing safe environments for all our students, including when they undertake third party work placements. However, international students may be vulnerable to exploitation when engaging in work outside of their course of study, such as casual or part time work. In Australia, international students may seek positions in sectors where there are higher risks of modern slavery, such as hospitality. They may also be unsure of their workplace rights and how to safely raise concerns. We have implemented several controls to protect the integrity of our offshore student recruitment processes and support the wellbeing of our students.
LABOUR HIRE AND TEMPORARY WORKERS  Potential risk level: Lower	Modern slavery risks can be associated with the use of labour hire and temporary workers in Australia. Western utilises the BuyNSW Talent Acquisition Scheme for temporary workforce and labour hire. This scheme offers a list of prequalified suppliers to source, assess and select talent for executive and non-executive roles. Using the scheme supports us to undertake the procurement of talent ethically, transparently, and with safeguards in place for potential employees. It also helps reduce risks associated with worker exploitation, non-compliance, and unfair employment conditions, while ensuring that providers adhere to modern slavery regulations and ethical hiring practices.
INVESTMENTS  Potential risk level: Lower	The University has an investment portfolio which is managed by an external fund manager which acts in accordance with its own modern slavery objectives and within the ESG framework set by the University. Outcomes and compliance to the framework is reported to the University’s Finance and Investment Committee on an annual basis. The University is committed to responsible investment and works closely with its fund manager to help ensure ESG risks are integrated into the development and implementation of the University’s investment portfolios (see page 24).

RESEARCH PARTNERSHIPS AND CLINICAL TRIALS



Potential risk level:
Lower

Western is committed to championing research that aligns with the United Nations Sustainable Development Goals (SDGs). We recognise that in some contexts, external partnerships may pose modern slavery risks, including in situations where this may limit our visibility and control over how modern slavery controls are implemented. As outlined on page 24, we take a range of steps to manage risks in this space.

In addition to broader research partnerships, another potential area of modern slavery risk for universities can include clinical trials. While we recognise clinical trials may present modern slavery and broader human rights risks in certain circumstances (such as around identification of participants), we consider modern slavery risks in our clinical trials to be low for a range of reasons.

Importantly, our clinical trials are reviewed by either the University Human Research Ethics Committee (HREC) in line with the National Statement on Ethical Conduct in Human Research, or an external ethics committee. This includes consideration of any potential risks associated with any outsourced components, such as identifying participants. The National Statement on Ethical Conduct in Human Research explicitly addresses coercion and pressure and the requirement and importance of voluntary consent of participants. Research participants are also provided with a Participant Information Sheet, which outlines the project details, how the trial will be conducted and contact information for raising concerns or complaints. Most clinical trials conducted by University staff are also undertaken in public health settings, such as hospitals and it is a requirement for all clinical trials that a University staff member be appointed as a Chief Investigator who is accountable for the trial's conduct.



16/ IDENTIFYING OUR MODERN SLAVERY RISKS – CONTINUED

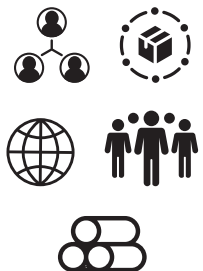
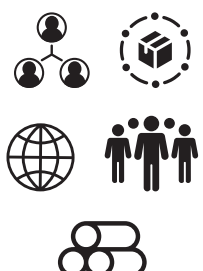
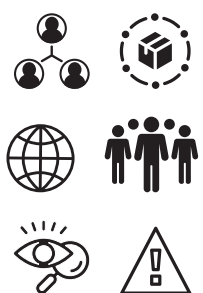
MODERN SLAVERY RISKS IN OUR SUPPLY CHAIN

Through our risk assessments, we have identified that our greatest exposure to risks of modern slavery is through our supply chain. The table below outlines the key risk areas we have identified across our supply chain, including relevant modern slavery risk factors. While we assess these risks are present across our supply chain, we recognise they may be heightened for sourcing we undertake in offshore geographies. To support us to manage these risks, our procurement policies and procedures direct our offshore entities to engage Western's central procurement team for procurement activities above a set threshold.

EXAMPLES OF MODERN SLAVERY RISK FACTORS

Reliance On Subcontracting	Reliance on Temporary/ Migrant Workers	Limited Supply Chain Visibility	Raw Material Risks	Sourcing From High-Risk Geographies	Challenges Monitoring Working Conditions For Workers On Our Sites	Reliance On Lower-Skilled Labour	Unsafe Working Conditions
							

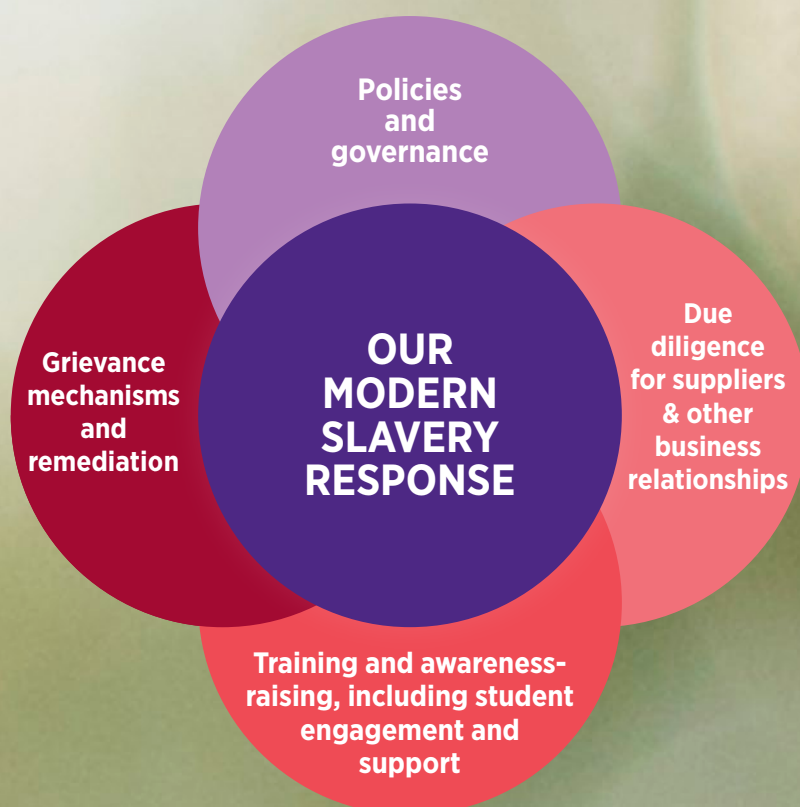
KEY RISK AREA	MODERN SLAVERY RISK FACTORS	HYPOTHETICAL EXAMPLES	OUR RELATIONSHIP TO THE RISK	OUR INDICATIVE LEVERAGE
Facilities management (cleaning, security, catering, landscaping and other services) 9.52% of spend.	    	Cleaners at a university campus are repeatedly forced to work excessively long shifts without appropriate breaks, experience significant underpayment, and are not provided with adequate PPE by the cleaning provider.	Directly linked.	We typically have a higher degree of leverage with relevant service providers, due to the volume of our spend and as services are provided on our sites.
Logistics and warehousing services (freight and logistics services across the supply chain) 0.03% of spend.	    	A construction provider engaged by a university utilises logistics services that exploit its workers.	Directly linked.	We typically have a lower degree of leverage in this area, including as these types of service providers are generally selected and managed by suppliers or sub suppliers deeper in the supply chain.

KEY RISK AREA	MODERN SLAVERY RISK FACTORS	HYPOTHETICAL EXAMPLES	OUR RELATIONSHIP TO THE RISK	OUR INDICATIVE LEVERAGE
IT hardware and software (including offshore support services) 8.57% of spend.		A university procures desktop computers, laptops, and mobile phones which contain raw materials that were mined using the worst forms of child labour.	Directly linked.	We typically have a lower degree of leverage in this area, as these goods tend to have long and complex supply chains and are produced by large global companies for whom our volume of spend is not significant. Support services are generally outsourced by suppliers to providers operating offshore, which can limit our visibility of working conditions.
Apparel (including uniforms, PPE and branded merchandise and promotional items) 0.6% of spend.		A university procures uniforms for staff using an Australian-based supplier that sources its products offshore. Migrant workers at the offshore factory have their identity documents confiscated, are forced to work and are threatened with deportation if they seek assistance from authorities.	Directly linked.	We typically have a moderate to lower degree of leverage in this area, which reflects factors such as the volume of our spend, as well as the high levels of subcontracting in the apparel supply chain.
Teaching and research consumables (including medical and scientific equipment and laboratory consumables, including rubber gloves) 4.07% of spend.		Consumables used for teaching, laboratory, and research purposes are manufactured by workers who are exploited through forced labour and are unable to leave the factory complex.	Directly linked.	We typically have a lower degree of leverage in this area, as our suppliers of these goods generally source products that are manufactured offshore, reducing our visibility of these supply chains.
Construction labour and materials 14.78% of spend.		Workers undertaking demolition work at a construction site on a university campus are transported to and from the work site and have their movements restricted when at the offsite accommodation.	Directly linked.	We may have a moderate to higher degree of leverage with construction companies due to the volume of our spend, ability to specify the types of materials used and as services are provided on our sites.

18/ **OUR ACTIONS TO ADDRESS OUR MODERN SLAVERY RISKS**

At Western, we are working to address our modern slavery risks guided by our Modern Slavery Roadmap.

We continue to undertake targeted initiatives to mitigate our modern slavery risks and prioritise continuous improvement. Our key areas of action include:



POLICIES AND GOVERNANCE

Our response to modern slavery is supported by our policy and governance framework. This framework allocates responsibility for managing and overseeing our modern slavery response and sets clear expectations for our staff, contractors, students and other stakeholders around modern slavery and broader human rights issues (such as health and safety), including how to safely raise concerns. We also continue to maintain an internal Roadmap for Implementation which sets out priority actions to address modern slavery and wider human rights risks.



22/ OUR ACTIONS TO ADDRESS OUR MODERN SLAVERY RISKS – CONTINUED

POLICY	PURPOSE AND RELEVANCE TO MODERN SLAVERY	HOW WE COMMUNICATE THIS POLICY
Human Rights Policy	Commits the University to respecting the fundamental human rights of its employees, students, stakeholders, and those with whom we have relationships.	This policy was launched in December 2025. Formal communications will be issued in the first quarter of 2026 to all staff to reinforce awareness of the Policy and support its integration into everyday decision-making and operational processes across the University.
Sustainable Procurement Framework	Helps ensure the University's procurement activities contribute to a resilient, inclusive, and sustainable society. Modern slavery is one of five focus areas identified in the framework. The framework applies proportionately based on procurement thresholds.	The framework is being implemented over 2025-26, with implementation and oversight led by the Procurement Governance and Sustainability team. This has included awareness raising through a one page information sheet about the framework.
Code of Conduct	Sets out principles to guide the behaviour expected of Western's staff, students employed by the University, and affiliates in line with the University's values, which include integrity, equity, and accountability. The principles in the Code also apply to clients, colleagues and partners engaged in employment or partnerships with the University.	The Code of Conduct is available on our website and communicated to all staff through staff onboarding (including new employees' Letter of Offer).
Complaint Management Policy	Explains how the University deals with complaints from current and prospective students, staff and members of the public, which could include modern slavery related matters.	The Complaints Policy is available on our website.
Health Safety and Wellbeing Policy	Outlines the University's commitment to the physical and psychological safety of our staff, students and all University community members. The Policy outlines our commitment to ensuring a safe and healthy working environment.	The Health, Safety and Wellbeing Policy is available on our website.
Modern Slavery Prevention Policy	Sets out the University's approach to addressing modern slavery, including a commitment to undertake due diligence and work with suppliers. It also prohibits employees from any involvement in modern slavery.	The Modern Slavery Prevention Policy is available on our website
Investment Policy	Sets out the steps for monitoring and reporting the investment and performance of all investments made by the University. The Policy includes a section on Responsible Investments that articulates the University's commitment to being a sustainable University investor.	The Investment Policy is available on our website.
Whistleblowing Policy	Establishes a framework for reporting and managing reports of serious wrongdoing. Modern slavery-related matters may be brought forward as part of reports raised under the Whistleblowing Policy. The Policy is supported by a procedure that sets out how complaints should be investigated.	The Whistleblowing Policy is available on our website

SPOTLIGHT: LAUNCH OF OUR HUMAN RIGHTS POLICY

In 2025, we finalised and launched Western's first Human Rights Policy. The Policy is a significant development and underscores our recognition that human rights are relevant to universities in a wide range of ways, including in relation to modern slavery.

Importantly, and in line with the UN Guiding Principles on Business and Human Rights, the Policy commits us to respect human rights, including by: integrating human rights due diligence processes across our operations, partnerships and supply chains; engaging with stakeholders; and maintaining clear grievance mechanisms to allow for the safe reporting of concerns. These commitments provide a broader and more integrated foundation for addressing modern slavery and other human rights risks across our operations, teaching, research and partnerships.

The Human Rights Policy was developed over 2024 and 2025 by Western's Procurement Governance and Sustainability team in collaboration with Western's Environmental Sustainability team and the Justice Clinic. Consultation was also undertaken with other areas of the University to help ensure the policy effectively integrates human rights considerations into the University's approach to governance, operations, and engagement with external stakeholders.



22/ OUR ACTIONS TO ADDRESS OUR MODERN SLAVERY RISKS – CONTINUED

DUE DILIGENCE FOR SUPPLIERS AND OTHER BUSINESS PARTNERSHIPS

We work to proactively engage with our suppliers and other business partners to manage modern slavery risks.

SUPPLIER DUE DILIGENCE

As many of our key modern slavery risks are in our supply chain, supplier due diligence is a key element of our modern slavery response. Our supplier due diligence approach is informed by our Sustainable Procurement Framework and includes the following actions which we implement where appropriate based on the modern slavery risk level of the procurement.



In addition to these due diligence steps, we also engaged with internal stakeholders over 2025 to better understand and raise awareness of risks associated with student placements, labour hire, facilities management and contracted services. This included engagement around the renewal of a key services contract, as well as more general awareness-raising with key teams, including the team responsible for student placements.

We are also working to further strengthen our procurement processes by implementing a new procurement system over 2026. The system is expected to support enhanced engagement with suppliers, including more frequent use of SAQs and improved supplier risk analytics to inform ethical and responsible purchasing decisions. Western has also recruited a Contracts and Supplier Management Officer to improve the effectiveness of supplier arrangements across the University. This role's responsibilities involve advancing sustainable procurement priorities and supporting due diligence and risk management (including around modern slavery).

SPOTLIGHT: ADDRESSING RISKS IN THE ELECTRONICS SUPPLY CHAIN

As outlined in the risks section, electronics such as IT hardware can involve a range of modern slavery risks.

During 2025, we participated in a pilot project through the AUPN with Electronics Watch. This project aims to provide deeper visibility into electronics supply chains and support coordinated responses where risks are identified. To date, the pilot has involved mapping 27 factories and identifying higher risk factories in four countries. This identified 13 cases of labour rights issues which are being remediated through Electronics Watch.

SPOTLIGHT: ADDRESSING RISKS RELATED TO INTERNATIONAL STUDENT RECRUITMENT CONSULTANTS

In 2024, we reported on steps to engage with a migration agency named in media reporting as allegedly involved in the deceptive recruitment of international students.

While the concerns raised in the media did not relate to specific students at Western, Western's Procurement Governance and Sustainability team and the International Student Recruitment team reviewed opportunities to further enhance our risk management approach in this area.

As a result, over 2025, the modern slavery clauses used in our standard Overseas Agent Agreement were reviewed and strengthened to incorporate additional specific provisions relating to modern slavery, child exploitation, and debt bondage. We are continuing to monitor risks in this area, including to assess whether additional action may be appropriate.

During 2025, we also shared a survey with over 3,000 of our students asking about their experience with education agents. The survey included questions relating to modern slavery, such as whether students were asked to hand over passports to agents and whether agents had offered students work opportunities in Australia. A small number of students who responded to the survey indicated they would like to discuss the matters raised in the survey further but were unsure of how to access University support. The international team connected these students with the student welfare team.

24/ OUR ACTIONS TO ADDRESS OUR MODERN SLAVERY RISKS – CONTINUED

RESEARCH PARTNER DUE DILIGENCE

In addition to due diligence checks for our suppliers, Western also conducts due diligence on research projects, partnerships, and recruitment of project personnel, both domestically and internationally to assess potential modern slavery risks.

These due diligence checks can include reviewing research agreements and memorandums of understanding to identify potential risks, such as modern slavery concerns in supply chains, historical issues linked to partner entities, and any legal disputes. We also utilise a mandatory Research Risk Form to help detect potential modern slavery risks by examining supplier relationships, funding sources, and collaborations. Where appropriate, we use global indices such as the Corruption Perceptions Index, Academic Freedom Index, Democracies Index, Freedom House Index, and Human Rights Index, to assess risks associated with specific countries and partners. This due diligence is supported by training for staff on ethical research practices and regular audits of research partnerships against key standards, which can include modern slavery.

RESPONSIBLE INVESTMENT

The University is committed to Responsible Investment and seeks to ensure ESG issues such as modern slavery are integrated into the development and implementation of the University's investment portfolios. The University is a signatory to the SDGs and seeks to support these through its investments where possible.

The University has appointed Mercer as its implemented consultant. Mercer Group is a founding signatory to the Principles for Responsible Investment (PRI), which began in 2006 as a United Nations-supported network of investors.

In keeping with the requirements of the Modern Slavery Act and our commitment to protecting human rights, Western reviewed its listed investments for any potential exposure to modern slavery incidents or risks. As of 30 June 2025, the University's portfolio was found to have no holdings with modern slavery red flags.

TRAINING AND AWARENESS-RAISING, INCLUDING STUDENT ENGAGEMENT AND SUPPORT

Over 2025, we continued to implement modern slavery training and awareness-raising activities. These included a range of initiatives specifically focused on international students. Key activities included:

GENERAL TRAINING AND AWARENESS-RAISING

- Targeted training on modern slavery for selected staff who are involved in the procurement process and financial delegates. This mandatory training was delivered through an e-learning module and will continue annually. The module is also available for all staff to complete as an optional training.

TRAINING AND AWARENESS-RAISING FOR STUDENTS

- Releasing a 15 minute student modern slavery e-learning module to international students. The module explains modern slavery risks and red flags and how to safely seek help.
- Supporting a cohort of 12 final-year law students in the Justice Clinic to undertake intensive training and practical learning to become Western's inaugural Anti-Slavery Student Ambassadors. The students completed academic and e-learning modules, worked on Justice Clinic client cases involving modern slavery and trafficking, and spoke with case worker partners from the Australian Red Cross to understand more about how modern slavery can occur. The Ambassadors also launched an advocacy campaign on campus (including a stall to engage with students) to raise awareness of modern slavery and the supports available to their peers, including international students.
- Ongoing provision of information to students about the University's wellbeing services such as counselling services and our pro bono legal service through the Justice Clinic. This includes information provided through student orientations.

OTHER STUDENT ENGAGEMENT AND SUPPORT ACTIVITIES

- Participating in a modern slavery roundtable on international student recruitment with representatives from 10 other universities, the Migrant Justice Institute, Australian Red Cross, Fair Futures, the Australian Federal Police, and the NSW Anti-Slavery Commissioner. The roundtable considered modern slavery risks across the entire student pathway, from recruitment to broader vulnerabilities post arrival. Key outcomes included agreement to develop sector-wide guidance in 2026 and to establish a platform to inform ongoing collaboration and consistent guidance.
- Surveying students about their experience with education agents (see page 23), including in relation to modern slavery red flags.
- Assessing the results of the 2024 National Temporary Migrant Survey, which we promoted to our international student cohort (including through direct emails to students and on-campus advertising). Western achieved a high level of responses which enabled the researchers to provide us with a report specific to our student cohort.

- Vetting of university-sanctioned work placements undertaken as part of a course of study to help ensure workplaces are safe for students.
- Including modern slavery clauses in our International Student Recruitment Agreements and enhancing these clauses to strengthen modern slavery related requirements (see page 23).
- Continuing to provide broader support to students through our Student Counselling, Disability and Welfare services. In 2025, the Wellbeing Service assisted 5,407 unique students and delivered 37,689 occasions of service.

EXTERNAL STAKEHOLDER COLLABORATION

Collaborating with our peers and other stakeholders enables us to share good practice and maximise our impact.

During 2025, we continued to connect and collaborate with the AUPN, which is a sector-wide collaboration involving universities across Australia and New Zealand. As a member of the AUPN, Western connects with other universities via regular collaborative sessions including forums, working groups and knowledge sessions to discuss and identify key initiatives. During 2025, this included:

- Engaging with peers and other expert stakeholders through an International Student Risk Roundtable.
- Supporting the National 2024 Temporary Migrant Survey to better understand international students' experiences, including in relation to modern slavery risks.
- Participating in Anti-Slavery Forums with expert external presenters, including from the office of the NSW Anti-Slavery Commissioner, a survivor with lived experience of modern slavery, the Australian Red Cross, Electronics Watch and other organisations involved in benchmarking modern slavery statements and supporting supplier due diligence.
- Contributing to sector-wide risk assessments covering over 180,000 suppliers and \$14 billion in combined spend, with priority focus on higher-risk categories such as construction, ICT, scientific and laboratory supplies, international student recruitment, and cleaning services.
- Continuing to engaging with selected suppliers around their modern slavery risk management through an SAQ process administered by the AUPN.
- Working with AUPN to engage with an Australian company sourcing products from offshore about media reporting related to alleged exploitive working practices by an offshore supplier. The AUPN Anti-Slavery and Responsible Sourcing Manager facilitated correspondence with the Australian company to obtain further information about the company's response, which was shared with Western and other universities.

Western also engaged directly with the Office of the NSW Anti-Slavery Commissioner to discuss opportunities for collaboration for student Anti-Slavery Ambassadors and to invite the Commissioner to present at the Australasian University Senior Finance Officers Group Conference. The Commissioner's presentation provided an opportunity for direct engagement with Chief Financial Officers and senior governance leaders across the higher education sector.

More broadly, we also participated in official consultations to inform proposed changes to the Modern Slavery Act. This included participating in a consultation session run by the Attorney-General's Department, as well as a separate "pulse check" with the Federal Anti-Slavery Commissioner's office and key sustainability practitioners to discuss the sector's experience and perspectives.

GRIEVANCE MECHANISMS AND REMEDIATION

At Western, we have a range of avenues for staff, students, and other stakeholders to raise concerns in-person or anonymously in relation to modern slavery.

We aim to take a 'no wrong door' approach to reports which could relate to modern slavery. We encourage staff, students, and any affected stakeholders from Western's community to raise concerns, no matter which channel they report through. Our priority is to listen and provide appropriate support

Western also maintains internal processes and guidance (including escalation pathways through the Office of General Counsel where required) to ensure any potential modern slavery incident is managed in a manner consistent with the NSW Anti-Slavery Commissioner's expectations and our commitment to respect human rights, including prioritising the wellbeing and safety of victim-survivors.

The chart below sets out the various reporting channels stakeholders can use to report modern slavery concerns and outlines how we may respond to reports received via our Whistleblowing mechanism.

Western did not identify any specific instances of modern slavery harm relevant to our operations or supply chains in 2025. However, we recognise the importance of continuing to work to ensure our grievance pathways are trusted by, and accessible to, potential users, including students. During 2025, we released an international student-focused modern slavery e-learning module that includes information about safe reporting pathways. We also continued to undertake student engagement and advocacy, including through the Justice Clinic and student ambassador initiatives (see page 27).

26/ OUR ACTIONS TO ADDRESS OUR MODERN SLAVERY RISKS – CONTINUED

SPOTLIGHT: WESTERN SYDNEY UNIVERSITY'S JUSTICE CLINIC

The Western Sydney University Justice Clinic is the University's community legal service and School of Law's experiential learning program and collaborates closely with key stakeholders.

The Western Sydney University Justice Clinic is the University's community legal service and School of Law's experiential learning program and collaborates closely with key stakeholders.

Justice Clinic lawyers work with victim-survivors of modern slavery to remediate their modern slavery experiences by accessing support through Victims Services NSW and other jurisdictions, where applicable. The Justice Clinic possesses a deep understanding of modern slavery legal frameworks and reporting regimes, dedication to access to justice for victim-survivors, practical experience in responding and delivering modern slavery-related legal services, and involvement in modern slavery research and law reform activities.

Throughout the reporting period, the Justice Clinic continued to provide pro bono legal advice and services to victim-survivors of modern slavery through a referral pathway established with the Salvation Army's Trafficking and Slavery Safe House. The Safe House programs provide specialist supported accommodation and complex case management for people who have experienced modern slavery including forced marriage, forced labour, trafficking, servitude and other slavery-like practices.

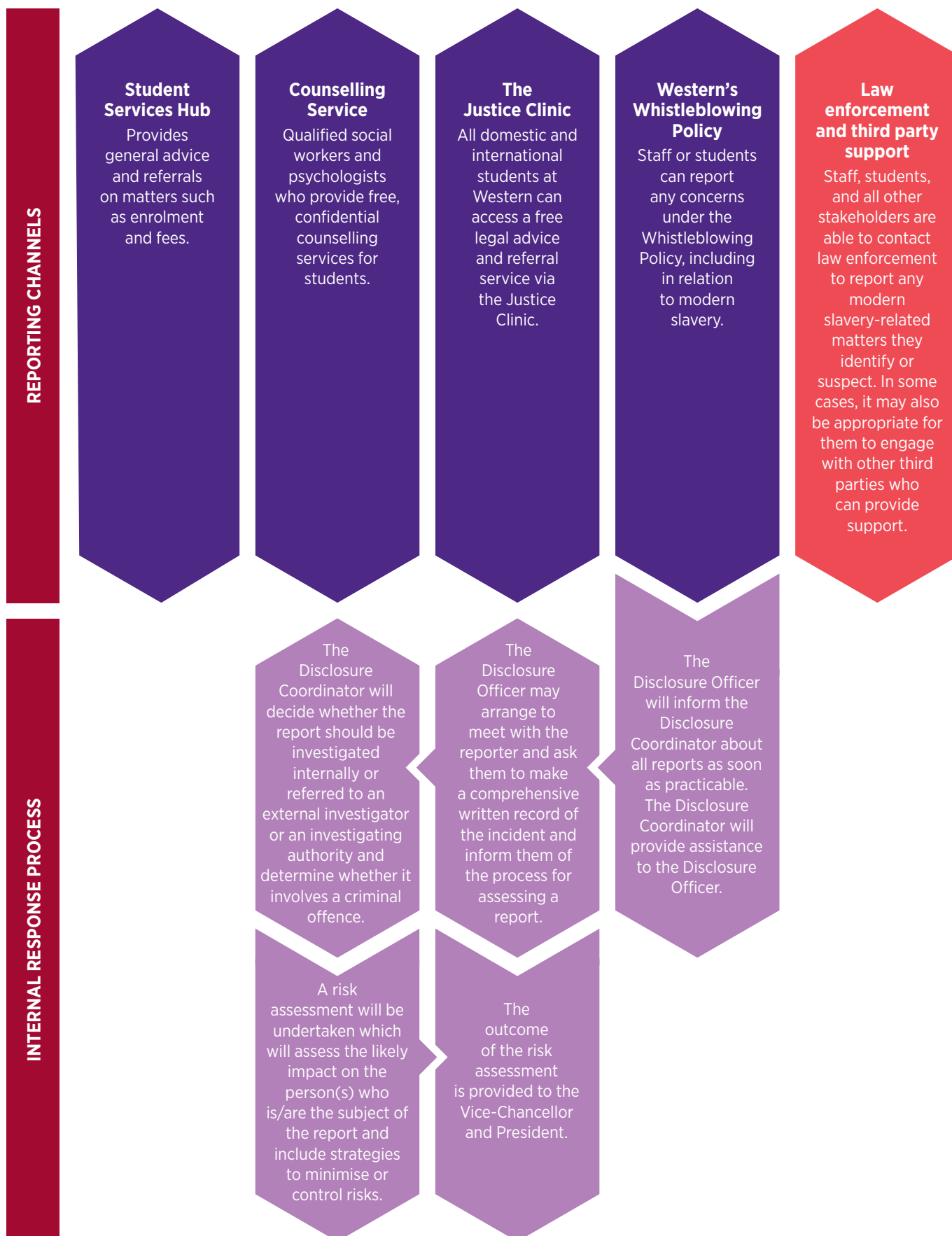
During 2025, the Justice Clinic renewed its MOU for another two years with the Salvation Army to continue to provide legal advice and services. The Justice Clinic also formed a new pro bono partnership with the law firm Wotton + Kearney to provide volunteers to the Justice Clinic to represent survivors of modern slavery in their victims support claims.

The Justice Clinic also runs the Student Legal Service, which is available as a front-line response to any students facing modern slavery issues, or staff wishing to refer concerns. During 2025, the Justice Clinic launched its inaugural Anti-Slavery Student Ambassador program, with 12 final-year law students completing intensive training through the Clinic.

More broadly, over 2025 the Justice Clinic continued its advocacy and law reform work through submissions and endorsements related to matters such as the *Victims Rights and Support Act* (NSW) and the NSW Parliament Inquiry into modern slavery risks faced by temporary migrant workers in rural and regional New South Wales. As a member of the advisory board for Royal Prince Alfred Hospital's Modern Slavery Screening Pilot, the then Director of the Justice Clinic also presented on the Clinic's work at the "Modern Slavery & Healthcare Charity Dinner and Education Evening" on 30 August 2025.



28/ OUR ACTIONS TO ADDRESS OUR MODERN SLAVERY RISKS – CONTINUED



29/ ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

We assess the effectiveness of our actions to manage modern slavery risks to understand our impact and identify opportunities for improvement.

We understand an effective response to modern slavery in the university sector to include:

- Maintaining an accurate understanding of potential modern slavery risk areas across our operations and supply chain
- Taking meaningful actions to manage identified risks; and
- Providing safe and accessible reporting channels for stakeholders to raise concerns.

AREA	CONTROLS	INDICATORS
Policy and governance framework	→ Engagement with the Board and Board Committees. → Policies and procedures.	→ Targeted engagement on modern slavery with the Board and Board Committees. → Regular review of policies and guidelines relating to modern slavery and development of new policies where appropriate.
Supplier due diligence	→ Integration of modern slavery considerations into procurement processes (i.e. SAQs, and tender and contract clauses).	→ Inclusion of modern slavery-related requirements into all procurement requirements directly managed by the Procurement team. → Suppliers' provision of evidence of their ability to meet Western's policies and guidelines. → Tender schedules for major activities, with tenderers to provide details on their approach to mitigating modern slavery risks.
Research partnerships	→ Due diligence on research partnerships.	→ Number of due diligence assessments undertaken and proportion of results showing modern slavery concerns.
Investments	→ Integration of ESG issues, including modern slavery, into the development and implementation of the University's investment portfolios.	→ Level of engagement on human rights-related issues, including modern slavery, in investment decision making.
Training and awareness-raising	→ Modern slavery e-Learning modules for staff and students. → Procurement Roadshows.	→ Completion rates of modern slavery e-Learning modules. → Feedback received from end of e-Learning module surveys to staff and students. → Frequency of Procurement Roadshow presentations and feedback received.
Support for students	→ The Justice Clinic. → Student Legal Services. → Student Welfare Services. → Complaint Resolution Unit.	→ Student awareness of available support services. → Level of student engagement with support services.
Stakeholder collaboration	→ External collaboration and benchmarking.	→ Collaboration with sector peers and informal benchmarking of progress and initiatives against the sector.
Grievance mechanisms and remediation	→ Whistleblowing mechanism. → Complaint Management Policy. → The Justice Clinic.	→ Number of reports received through grievance channels related to modern slavery. → Review of the effectiveness of Western's grievance mechanisms in line with the UNGPs' effectiveness criteria for non-judicial grievance mechanisms.

30/ CONSULTATION

The reporting entity and its affiliates, which constitute owned or controlled entities for the purposes of the Modern Slavery Act 2018 (Cth), operate under the direction and governance of the University.

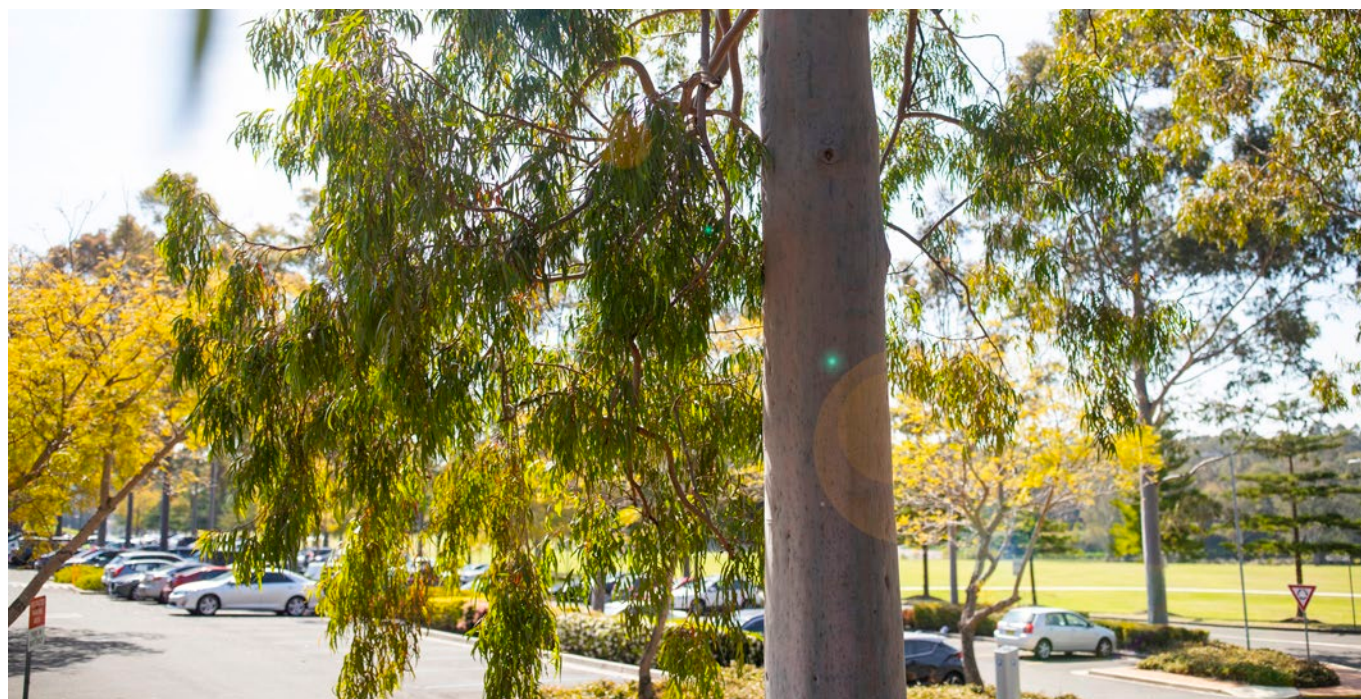
CONSULTATION WITH REPORTING ENTITIES

As this statement only covers a single reporting entity, the Modern Slavery Act 2018 (Cth) requirement to consult with other reporting entities is not applicable.

CONSULTATION WITH OWNED AND CONTROLLED ENTITIES

This statement was developed in consultation with Western's affiliates. The primary mechanism for consultation was through direct engagement with representatives from teams with roles and responsibilities that cover Western's affiliates. A draft of the statement was also shared with other relevant stakeholders across Western.

CRITERION	SECTION OF STATEMENT WHICH ADDRESSES THIS CRITERION
Details of reporting entity	→ About this statement
Reporting entities' structure, operations and supply chain	→ About Western Sydney University; Our operations at a glance; Our supply chain at a glance
Modern slavery risks in operations and supply chain	→ Identifying our modern slavery risks
Actions taken to assess and address risks	→ Our actions to address our modern slavery risks; Our 2025 progress and future priorities
Assessing effectiveness of actions	→ Assessing the effectiveness of our actions
Consultation process with reporting entities	→ Consultation
Any other relevant information	→ Message from our Chancellor and Vice-Chancellor



31/ APPENDIX 1: ENTITIES COVERED BY THIS STATEMENT

Note: The entities listed below are not reporting entities for the purposes of the Modern Slavery Act 2018 (Cth). Western Sydney University (ABN 53 014 069 881) is the sole reporting entity for the purposes of the Modern Slavery Act 2018 (Cth).

THE WHITLAM INSTITUTE

The Whitlam Institute within Western Sydney University is a dynamic research and public policy think tank, prime ministerial archive, and public museum that commemorates and is inspired by the life and work of the Hon Gough Whitlam AC QC, Australia's twenty-first Prime Minister. The Institute advances the contemporary relevance of Mr. Whitlam's ideas and pursues the causes he and his Government championed.

WESTERN SYDNEY UNIVERSITY THE COLLEGE

Western Sydney University The College provides students with high-quality academic pathways to further their studies at Western Sydney University through University Preparation and Diploma programs. The English Language Centre offers language proficiency training and testing services, and vocational programs are offered by The College's Registered Training Organisation (RTO).

WESTERN SYDNEY UNIVERSITY EARLY LEARNING LTD

Western Sydney University Early Learning Ltd delivers high-quality care and education for children in their early years, providing a strong foundation for a lifetime of learning. Through sites across the Western campus network, Western Sydney University's Early Learning follows the latest research and best-practice models, including the National Quality Framework.

WESTERN SYDNEY UNIVERSITY INTERNATIONAL COLLEGE

The Joint Venture between Western Sydney University Enterprises Pty Ltd and Navitas to operate the Western Sydney University International College (WSUIC) in Parramatta has entered its ninth year of operation. WSUIC transitioned to independent operations, with WSUIC obtaining accreditation for its Diploma in Engineering. All commencing WSUIC students now enrol into the College's own TEQSA-accredited diplomas and Foundation Studies Program.

WESTERN GROWTH DEVELOPMENTS (PARRAMATTA INNOVATION HUB) PTY LTD

Western Growth Developments (Innovation Hub Parramatta) Pty Ltd was incorporated on 4 June 2018 to pursue its purpose of promoting scholarship, research, free inquiry, the interaction of research and teaching, and academic excellence. Principally, the entity was the co-developer with respect to the Parramatta Innovation Hub project. The entity divested its interest in the development to realise returns at project completion.

WESTERN GROWTH DEVELOPMENTS (WESTMEAD) PTY LTD

Western Growth Developments (Westmead) Pty Ltd was incorporated on 5 April 2018 to pursue its purpose of promoting scholarship, research, free inquiry, the interaction of research and teaching, and academic excellence. Principally, the entity is the co-developer with respect to the Westmead Innovation Quarter project. The entity divested its interest in stage one of the development to realise returns at project completion. The entity will operate the completed project (stages 2 and 3) to generate returns for the purpose of pursuing its objectives.

YAYASAN WESTERN SYDNEY UNIVERSITY INDONESIA (WESTERN SYDNEY UNIVERSITY INDONESIA FOUNDATION)

Western Sydney University officially opened its Surabaya campus in Indonesia on 13 February 2025. The campus welcomed its first cohort of students in September 2024. Located in Pakuwon Tower in the heart of Surabaya, East Java, the campus offers degrees in high-demand fields such as business, data science, information and communications technology, and computer science, providing students with the opportunity to study a Western Sydney University degree in Indonesia and graduate with a globally recognised qualification.

32/ APPENDIX 2: GRS ANNUAL REPORTING

The information in this Appendix has been provided to support our reporting obligation under the New South Wales (NSW) *Modern Slavery Act 2018* (NSW Act) and in line with the *NSW Anti-Slavery Commissioner's Guidance on Reasonable Steps to Manage Modern Slavery Risks in Operations and Supply-Chains* (NSW Commissioner's Guidance). This Appendix includes information about steps taken by the University and its affiliated entities, Whitlam Institute within Western Sydney University Limited (ABN/ACN 50 100 342 309), Whitlam Trust within Western Sydney University Trust (ABN/ACN 42 247 216 279), Western Sydney University Enterprises Pty Limited trading as Western Sydney University The College (ABN/ACN 44 003 474 468), Western Sydney University Early Learning Limited (ABN/ACN 39 155 993 445), Western Growth Developments (Parramatta Innovation Hub) Pty Limited (ABN/ACN 36 626 590 029), Western Growth Developments (Westmead) Pty Limited (ABN/ACN 93 625 406 411), Western Sydney University International College Pty Limited trading as Western Sydney University International College (International College) (ABN/ACN 25 604 796 189) Yayasan Western Sydney University Indonesia (Western Sydney University Indonesia Foundation) to address the vulnerability of international students to modern slavery in response to the NSW Anti-Slavery Commissioner raising this as a 'significant issue' for universities under section 31(1)(a) of the NSW Act.

REPORTING CRITERIA UNDER THE NSW COMMISSIONER'S GUIDANCE	RELEVANT SECTION IN OUR MODERN SLAVERY STATEMENT*	INFORMATION ABOUT WESTERN SYDNEY UNIVERSITY'S RESPONSE
*Due to differences in the timing between the publication of this Annual Report and Western Sydney University's Modern Slavery Statement, the title of sections in the Modern Slavery Statement may vary from those shown below.		
Total procurement spend	About Western Sydney University	Between 1 January 2025 and 31 December 2025, the University's total procurement spend was approximately \$377.3M.
1. Commit		
1.1 Stakeholder Engagement		
What steps did your entity take to engage with stakeholders during this reporting period in relation to modern slavery?	Stakeholder Collaboration	In line with the NSW Anti-Slavery Commissioner's guidance, Western recognises that addressing modern slavery requires collective and coordinated action across sectors. During FY25, Western continued its active participation in the Australasian Universities Procurement Network (AUPN) University Anti-Slavery Program, a sector-wide collaboration involving universities across Australia and New Zealand. Through this program, Western engaged in regular forums, working groups and knowledge-sharing sessions focused on modern slavery risk identification, supplier engagement, international student risk, and capability uplift across staff and students. AUPN engagement in FY25 included collaboration with civil society and specialist organisations working directly with affected or potentially affected stakeholders, including the Australian Red Cross, Electronics Watch, Fair Futures, the NSW Anti-Slavery Commissioner's Office, and advocacy organisations focused on temporary migrants and international students. At an institutional level, Western also strengthened internal stakeholder engagement through: → Release of a University-wide Human Rights Policy, reinforcing expectations across operations, teaching, research and partnerships → Release of the Sustainable Procurement Framework, embedding modern slavery considerations into procurement decision-making and supplier engagement → Ongoing engagement with student-facing services, the Justice Clinic, Procurement, Legal, and International Student teams to support a more integrated operational response to modern slavery risks.

REPORTING CRITERIA UNDER THE NSW COMMISSIONER'S GUIDANCE	RELEVANT SECTION IN OUR MODERN SLAVERY STATEMENT*	INFORMATION ABOUT WESTERN SYDNEY UNIVERSITY'S RESPONSE
Did you engage with external stakeholders on modern slavery risks in this reporting period?	Stakeholder Collaboration	Yes. During the 2025 reporting period, we engaged with external stakeholders on modern slavery risks through policy consultation and sector collaboration. We participated in the Attorney-General's Department's (AGD) targeted consultations on the 'Stream B' law reform issues arising from the McMillan Report, focusing on the proposed due diligence obligation (Recommendation 11) and high-risk declarations (Recommendation 27), as outlined in the AGD Consultation Paper on Strengthening the Modern Slavery Act. The Australian Anti-Slavery Commissioner's Office conducted a "pulse check" with key sustainability practitioners, including Western, to understand sector readiness and perspectives on Stream B topics. We also participated in the International Student Risk Roundtable, which brought together universities and key external stakeholders, including the Migrant Justice Institute, Australian Red Cross, Fair Futures, the Australian Federal Police, and the NSW Anti-Slavery Commissioner. Discussions focused on modern slavery risks across the entire international student pathway, from recruitment and contract arrangements to post-arrival vulnerabilities. Key outcomes included agreement to develop sector-wide guidance for executive endorsement (scheduled for completion in 2026), recognition that risks affecting international students are a direct responsibility of universities requiring consistent internal accountability, and the establishment of a platform for ongoing collaboration and nationally consistent guidance.
1.2 Identify salient risks at the organisational level		
What steps did your entity take to identify salient modern slavery risks at the organisational level (i.e. across all operational and procurement activities) during this reporting period?	Identifying our modern slavery risks	During FY25, Western continued to refine its understanding of modern slavery risks across its operations and supply chains, focusing on areas where the University may cause, contribute to, or be directly linked to modern slavery risks, consistent with the UN Guiding Principles on Business and Human Rights (UNGPs). Western drew on multiple information sources to inform its risk profile, including: → The Global Slavery Index → NSW Anti-Slavery Commissioner resources, including the Inherent Risk Identification Tool → Guidance from the Australian Government → Sector intelligence and peer collaboration through the AUPN University Anti-Slavery Program → Evidence emerging from international student-focused initiatives, including the National Temporary Migrant Survey and International Student Risk Roundtable In FY25, Western also progressed operational risk identification through: → Release of the Human Rights Policy, clarifying expectations and responsibilities across University activities → Targeted work relating to international student recruitment, employment and wellbeing, including a University-led International Student Survey to better understand student experiences, access to support, and potential vulnerabilities → Ongoing engagement with internal stakeholders to better understand risks associated with student placements, labour hire, facilities management and contracted services → It's inaugural Anti-Slavery Student Ambassador program, with 12 final-year law students completing intensive training through the WSU Justice Clinic.

34/ APPENDIX 2: GRS ANNUAL REPORTING – CONTINUED

REPORTING CRITERIA UNDER THE NSW COMMISSIONER'S GUIDANCE	RELEVANT SECTION IN OUR MODERN SLAVERY STATEMENT*	INFORMATION ABOUT WESTERN SYDNEY UNIVERSITY'S RESPONSE
*Due to differences in the timing between the publication of this Annual Report and Western Sydney University's Modern Slavery Statement, the title of sections in the Modern Slavery Statement may vary from those shown below.		
Did you conduct or update a Salient Modern Slavery Risk Assessment in this reporting period?	N/A	Western did not conduct or update a formal Salient Modern Slavery Risk Assessment during FY25. However, the University continued to review and refine its modern slavery risk profile through the activities described above.
1.3 Modern Slavery Policy		
What steps did your entity take to adopt a Modern Slavery Policy during this reporting period?	Governance Framework	Western continued to operate under its Modern Slavery Prevention Policy, which sets out the University's commitment to preventing modern slavery, undertaking due diligence, and working with suppliers and partners to mitigate risks. In FY25, Western strengthened its policy framework through the implementation of a University-wide Human Rights Policy, providing a broader and more integrated foundation for addressing modern slavery and other human rights risks across operations, teaching, research and partnerships.
Do you have a modern slavery policy, approved by your senior governing body (e.g. Agency Head/Secretary), in place?	Governance Framework	Western's Modern Slavery Prevention Policy was approved by the University's then Vice Chancellor and President on 1 March 2022 and was most recently revised and re-approved by the then Vice Chancellor and President on 9 April 2024.
1.4 Modern Slavery Risk Management Plan		
What steps did your entity take to adopt a Modern Slavery Risk Management Plan during this reporting period?	Our actions to address our modern slavery risks	Western does not currently maintain a standalone Modern Slavery Risk Management Plan. However, during FY25 the University continued to strengthen its risk management approach through: → Implementation of the Sustainable Procurement Framework, embedding modern slavery considerations into procurement processes and supplier engagement → An internal Roadmap for Implementation, setting out priority actions across modern slavery and broader human rights risks → Participation in sector-wide risk identification and prioritisation activities through the AUPN University Anti-Slavery Program
Do you have a modern slavery risk management plan, approved by your senior management, in place?	N/A	No. Please see further context about our response above.

REPORTING CRITERIA UNDER THE NSW COMMISSIONER'S GUIDANCE	RELEVANT SECTION IN OUR MODERN SLAVERY STATEMENT*	INFORMATION ABOUT WESTERN SYDNEY UNIVERSITY'S RESPONSE
*Due to differences in the timing between the publication of this Annual Report and Western Sydney University's Modern Slavery Statement, the title of sections in the Modern Slavery Statement may vary from those shown below.		
2. Plan		
2.1 Identify and map your supply-chain risks for each procurement		
What steps did your entity take to identify and map your modern slavery risks at the supply-chain level during this reporting period?	Identifying our modern slavery risks	Western continued to identify and map modern slavery risks at the supply-chain level through a risk-based approach informed by UNGPs, NSW guidance, and sector collaboration. Through the AUPN University Anti-Slavery Program, Western contributed to sector-wide risk assessments covering over 180,000 suppliers and \$14 billion in combined spend, with priority focus on higher-risk categories such as construction, ICT, scientific and laboratory supplies, international student recruitment, and cleaning services. Consistent with the NSW Commissioner's Guidance, we consider how we may cause, contribute or be directly linked to risks of modern slavery in line with the UNGPs. We also continued to draw on a range of information sources to help us understand our exposure to modern slavery risks across our operations and supply chains and how these risks may evolve over time. These sources include The Global Slavery Index, peer networks, resources from the NSW Anti-Slavery Commissioner (including the Inherent Risk Identification Tool), guidance from the Australian Government, as well as credible publications from human rights organisations and the media. Our key modern slavery risks related to our supply chain are detailed in our Modern Slavery Statement.
2.2 Develop a risk-reducing sourcing strategy		
What steps did your entity take to develop a modern slavery risk-reducing sourcing strategy during this reporting period?	Supplier Due Diligence	In FY25, Western progressed a more structured approach to risk-reducing sourcing by: → Implementing the Sustainable Procurement Framework, embedding social and human rights considerations, including modern slavery, into procurement planning and sourcing decisions. → Utilising the NSW Anti-Slavery Commissioners Guidance on Reasonable Steps and IRIT to identify risks and apply relevant due diligence, where applicable. → Participating in AUPN-led Supplier Assessment Questionnaires (SAQs) in higher-risk categories, including medical and laboratory supplies → Maintaining contractual provisions addressing modern slavery obligations and expectations and applying enhanced due diligence in higher-risk procurements during both sourcing activities and contract management. → Utilising the Government schemes.
3. Source		
3.1 Select appropriate suppliers		
What steps did your entity take to address modern slavery risks when selecting suppliers during this reporting period?	Supplier Due Diligence	Please refer to the description of our supplier due diligence approach in response to question 2.2.

36/ APPENDIX 2: GRS ANNUAL REPORTING

– CONTINUED

REPORTING CRITERIA UNDER THE NSW COMMISSIONER'S GUIDANCE	RELEVANT SECTION IN OUR MODERN SLAVERY STATEMENT*	INFORMATION ABOUT WESTERN SYDNEY UNIVERSITY'S RESPONSE
*Due to differences in the timing between the publication of this Annual Report and Western Sydney University's Modern Slavery Statement, the title of sections in the Modern Slavery Statement may vary from those shown below.		
3.2 Adopt a shared responsibility approach to contracting		
What steps did your entity take to adopt a shared responsibility approach to modern slavery risks, in contracting during this reporting period?	N/A	Western has reviewed the guidance and template clauses developed by the Commissioner's Office and is considering how a shared responsibility approach could be integrated into future contracting processes.
4. Manage		
4.1 Monitor and evaluate supplier performance		
What steps did your entity take to monitor and evaluate supplier performance relating to modern slavery, during this reporting period?	N/A	During FY25, Western continued to engage with suppliers through sector-wide initiatives led by the AUPN, including: → SAQ-based supplier engagement in laboratory and medical supplies → Participation in the Electronics Watch pilot, enabling deeper visibility into electronics supply chains and supporting coordinated remediation where risks were identified
Has your entity required any of your Tier 1 suppliers to undergo an audit addressing modern slavery risks in this reporting period?	N/A	Western did not require any suppliers to undergo an audit addressing modern slavery risks during the reporting period.
4.2 Develop supplier capabilities		
What steps did your entity take to develop supplier capabilities relating to modern slavery risks during this reporting period?	N/A	Western finalised a tender for a new procurement system, scheduled for implementation in 2026. The system is expected to support enhanced engagement with suppliers, including more frequent use of supplier assessment questionnaires (SAQs) and improved supplier risk analytics to inform ethical and responsible purchasing decisions.
5. Remedy		
5.1 Provide or enable access to effective grievance mechanisms		
What steps did your entity take to provide or enable access to effective modern slavery grievance mechanisms during this reporting period?	Grievance Mechanisms and Remediation	Western continued to maintain multiple accessible grievance and support pathways for staff, students and other stakeholders, including: → Student Services and Counselling → The Justice Clinic → Whistleblowing mechanisms In FY25, Western expanded awareness and accessibility of grievance pathways through: → Release of a student-focused modern slavery e-learning module, made available to international students → Targeted student engagement and advocacy through the Justice Clinic and student ambassador initiatives → Implementation of an International Student Survey to understand the recruitment experience of our students, identify any risks or improvements and to provide support to these students if required.

REPORTING CRITERIA UNDER THE NSW COMMISSIONER'S GUIDANCE	RELEVANT SECTION IN OUR MODERN SLAVERY STATEMENT*	INFORMATION ABOUT WESTERN SYDNEY UNIVERSITY'S RESPONSE
*Due to differences in the timing between the publication of this Annual Report and Western Sydney University's Modern Slavery Statement, the title of sections in the Modern Slavery Statement may vary from those shown below.		
5.2 Take safe immediate steps to remedy harm		
What steps did your entity take to safely and immediately remedy modern slavery harms to which you were connected during this reporting period?	N/A	Western did not identify any specific instances of modern slavery harm to which we identified we were connected during FY25. Western continues to encourage reporting of any concerns so they can be appropriately assessed and investigated. Western maintains internal processes and guidance (including escalation pathways through the Office of General Counsel where required) to ensure any potential modern slavery incident is managed in a manner consistent with the NSW Anti-Slavery Commissioner's expectations, including prioritising the wellbeing and safety of victim-survivors.
5.3 Use leverage to remediate deficient practices		
What steps did your entity take to use leverage to remediate deficient modern slavery risk management practices during this reporting period?	N/A	During FY25, Western did not identify any specific instances of deficient modern slavery risk management practices in relation to a supplier or sub-supplier that required Western to initiate a remediation process. However, Western continues to engage with suppliers and sector partners to strengthen supplier capability and support improved modern slavery risk management practices. This includes participation in the AUPN University Anti-Slavery Program's supplier engagement activity, including the deeper due diligence work in the medical equipment and laboratory supplies category and ongoing sector-wide remediation activity in electronics supply chains through the Electronics Watch pilot.
5.4 Withdraw responsibly		
What steps did your entity take to withdraw responsibly during this reporting period, in connection to modern slavery risks?	N/A	Western did not identify connections to any modern slavery harm or significant levels of modern slavery risk involving another entity during FY25 in relation to which we needed to consider withdrawing responsibly.
6. Report		
6.1 Establish a victim-centred reporting protocol		
What steps did your entity take to establish a victim-centred modern slavery reporting protocol during this reporting period?	Grievance Mechanisms and Remediation	Should Western identify a potential modern slavery incident, we would seek to respond in line with the NSW Anti-Slavery Commissioner's guidance, including by prioritising the wellbeing of victim-survivors. Western maintains a range of avenues for staff, students, and other stakeholders to raise concerns in-person or anonymously, including the Student Services Hub, Counselling Service, the Justice Clinic, and reporting pathways supported by University policies (including whistleblowing-related mechanisms). During FY25, Western continued to strengthen accessibility and awareness of support pathways through student-focused initiatives, including the rollout of a modern slavery e-learning module to international students, an international student survey to better understand awareness and support needs, and a student ambassador awareness campaign led through the Justice Clinic.
Do you have a modern slavery reporting protocol in place that prioritises the interests of the victim/survivor?	Grievance Mechanisms and Remediation	<i>This is a yes/no question. Yes.</i>

38/ APPENDIX 2: GRS ANNUAL REPORTING

– CONTINUED

REPORTING CRITERIA UNDER THE NSW COMMISSIONER'S GUIDANCE	RELEVANT SECTION IN OUR MODERN SLAVERY STATEMENT*	INFORMATION ABOUT WESTERN SYDNEY UNIVERSITY'S RESPONSE
*Due to differences in the timing between the publication of this Annual Report and Western Sydney University's Modern Slavery Statement, the title of sections in the Modern Slavery Statement may vary from those shown below.		
6.2 Report on your modern slavery risk management efforts		
What steps did your entity take to report on your modern slavery risk management efforts during this reporting period?	Commonwealth Modern Slavery Statement	Western prepared a Modern Slavery Statement, to comply with our obligations under the <i>Modern Slavery Act 2018 (Cth)</i> .
Did your entity report on modern slavery in its prior Annual Report?	Annual Report 2024	Yes. Western included information on its modern slavery response in its past Annual Report.
During the period, did your entity comply with its obligations to report heightened modern slavery due diligence (HMSDD) procurements valued at \$150,000 (inc. GST) or more within 45 days?	N/A	<i>Not applicable. The Commissioner has postponed the introduction of detailed HMSDD reporting.</i>
7. Improve		
7.1 Learn lessons from your performance and others'		
What steps did your entity take to learn lessons from your modern slavery performance and others' during this reporting period?	Stakeholder Collaboration Assessing the effectiveness of our actions	During FY25, Western engaged with the Office of the NSW Anti-Slavery Commissioner and participated in sector collaboration through the AUPN University Anti-Slavery Program. This supported shared learning regarding sector-wide challenges and emerging approaches to addressing modern slavery risks. Western also continued to refine its approach to assessing effectiveness by reviewing indicators and available measures of progress against key controls (including training uptake, supplier engagement activity, and student-facing initiatives). Western's approach to measuring effectiveness is described in the 'Assessing the effectiveness of our actions' section of our Modern Slavery Statement.
Has your entity updated its modern slavery policies or procedures based on stakeholder feedback or lessons from a grievance mechanism during this period?	N/A	<i>This is a yes/no question. No.</i>

REPORTING CRITERIA UNDER THE NSW COMMISSIONER'S GUIDANCE	RELEVANT SECTION IN OUR MODERN SLAVERY STATEMENT*	INFORMATION ABOUT WESTERN SYDNEY UNIVERSITY'S RESPONSE
*Due to differences in the timing between the publication of this Annual Report and Western Sydney University's Modern Slavery Statement, the title of sections in the Modern Slavery Statement may vary from those shown below.		
7.2 Train your workforce		
What steps did your entity take to train your workforce during this reporting period?	Training and Awareness	During FY25, Western progressed modern slavery training and awareness through a combination of staff and student-facing initiatives. Western continued to uplift capability through sector collaboration and training opportunities provided through the AUPN University Anti-Slavery Program, including regular forums and knowledge-sharing sessions focused on modern slavery risk identification and evolving best practice. Western also progressed targeted training and awareness activities internally, including initiatives delivered through procurement engagement and the Justice Clinic. During FY25, Western released a student modern slavery e-learning module to international students, an international student survey and supported a cohort of 12 final-year law students in the Justice Clinic to undertake intensive training and practical learning to become Western's inaugural Anti-Slavery Student Ambassadors. Key members of staff involved in the recruitment of international students were in attendance at the Modern Slavery Round Table for International Student Recruitment.
What percentage of your workforce received modern slavery training in the period?	N/A	During the reporting period, we focused on targeted training for selected staff who are involved in the procurement process and financial delegates, this will continue annually.
7.3 Cooperate with the NSW Anti-Slavery Commissioner		
What steps did your entity take to cooperate with the Anti-Slavery Commissioner during this reporting period?	Stakeholder Collaboration	During FY25, Western engaged with the Office of the NSW Anti-Slavery Commissioner to discuss opportunities for collaboration for student Anti-Slavery Ambassadors, along with participating in the roundtable. Western Sydney University invited the NSW Anti-Slavery Commissioner to present at the Australasian University Senior Finance Officers Group Conference. The Commissioner's provided an opportunity for direct engagement with Chief Financial Officers and senior governance leaders across the higher education sector.

Western Sydney University
Locked Bag 1797
Penrith NSW 2751 Australia



[WESTERNSYDNEY.EDU.AU](https://westernsydney.edu.au)